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~~March~~
April
March 23, 1976

Mr. Norman Butterworth
Aerovox Industries
740 Belleville Avenue
New Bedford, MA 02745

U.S. v. AEROVEX

Dear Mr. Butterworth:

Our reporting the presence of Aroclor 1242 in the samples of your and other capacitor manufacturing facilities has initiated a series of queries and comments since Aroclor 1016 replaced Aroclor 1242 at most places in 1971. According to our analysts, the results might better have been reported as 1016 and/or 1242. As you well know, both contain forty two percent chlorine by weight and have the same specific weight; the major difference being the reduction of pentachlors and hexachlors in the 1016. The differentiation between the two is academic. This seems to be borne out in that rarely, if ever, does one see data from field samples reporting both Aroclor 1242 and Aroclor 1016 in the same sample. Rather it is reported as one or the other.

When we, the sampling teams, submitted the collected samples for analyses, we did not inform the analysts that you were using any specific Aroclor. They knew that you were using PCB compounds, and they were asked to identify those present by homologue. Standards had been run on the gas chromatograph for both Aroclor 1242 and 1016, and these had been graphed as a series of peaks and valleys against time. The samples which our analysts reported as Aroclor 1242 had peaks similar to the Aroclor 1242 standard, and in the analysts' professional opinion, the compound was Aroclor 1242. These lesser peaks may have been caused by interferences, degradation, or in fact, the presence of Aroclor 1242; regardless, even knowing that these results would cause questions to arise, integrity dictated that I submit the data as presented to me. I felt, and still feel, this to be a valuable exchange of information. Since we are both seeking solutions to a problem of mutual concern, this gives added insight when weighing data concerning the presence of the various homologues in the environment. These data should not be considered as representing no recent addition of Aroclors to your waste streams, or that the waste stream contains only residual PCB, but that the reporting of Aroclor 1242 vs. 1016 may be interpretive results. The important point is that the total PCB concentration in the discharge is the number on which any permit will be issued and that number is relatively unchanged whether the compound is Aroclor 1016 or 1242.

If you have any questions or desire any further information, please
call me at (617) 223-7370

Sincerely yours,

Ray E. Thompson
Sanitary Engineer

RET:cb

cc: L. Gitto
W. Wirtanen
B. Sacks
E. Fitzpatrick
E. Taylor
W. Andrade